

1 JOHN R. MANNING
2 Attorney at Law
3 4005 Manzanita Ave, Ste. 6-8
Carmichael, CA 95608
(916) 444-3994
jmanninglaw@yahoo.com

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5 Attorney for Defendant
Carlos Lee Sanchez, Jr.

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7 IN THE UNITED STATES DISTRICT COURT
8 EASTERN DISTRICT OF CALIFORNIA

9 UNITED STATES OF AMERICA,

10 CASE NO. 2:24-CR-0281-DC

11 Plaintiff,

12 STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

13 v.

14 RICKY LEE WARE,
15 KIMBERLY ANN WALLACE and
CARLOS LEE SANCHEZ, Jr.
16 Defendants.

DATE: July 18, 2025 (requested date)
TIME: 9:00 a.m.
COURT: Hon. Dena M. Coggins

17 The United States of America through its undersigned counsel, Nicholas Fogg, Assistant United
18 States Attorney, together with counsel for defendant Ricky Lee Ware, Linda Parisi, Esq., counsel for
19 defendant Kimberly Ann Wallace, Candice L. Fields, Esq., and, counsel for defendant Carlos Lee
20 Sanchez, Jr., John R. Manning, hereby stipulate the following:

21 1. By previous order, this matter was set for status conference on June 23, 2025, at 9:30 a.m.,
22 before the Hon. Dale A. Drozd. Time was excluded between April 28, 2025 and June 23,
23 2025.

24 2. On, or about, April 21, 2025, Chief District Court Judge Hon. Troy L. Nunley reassigned the
25 matter to the Hon. Dena M. Coggins (ECF 63) and the previously set status conference (June
26 23, 2025) before Judge Drozd was vacated (presumably as was the prior speedy trial time
27 exclusions).

1 3. By this stipulation, the parties now move to continue the matter until July 18, 2025, at 9:00
2 a.m., and to exclude time between April 28, 2025, and July 18, 2025, under 18 U.S.C.

3 § 3161(h)(7)(A), B(iv) [Local Code T4] to allow defense counsel time to prepare. The parties
4 agree and stipulate, and request the Court find the following:

5 a) The government has produced discovery in this matter, to date, consisting of over
6 52,000 pages of investigative reports, photographs and video surveillance evidence and 3000
7 native files. The government has further indicated, on or about April 16, 2025, they will begin
8 producing (electronic) copies and/or extraction reports related to the eight seized electronic
9 devices (adding a significant volume of discovery to the already substantial amount of discovery
10 previously produced by the government).

11 b) Counsel for defendants have met with their clients to discuss their respective
12 cases. Defense counsel desire additional time to conduct investigation into the charges, the
13 alleged roles of their respective clients, and to review discovery in this case. Defense counsel
14 will need additional time to discuss potential resolutions with their clients, prepare pretrial
15 motions, and otherwise prepare for trial.

16 c) Counsel for defendants believe that failure to grant the above-requested
17 continuance would deny them the reasonable time necessary for effective preparation, taking into
18 account the exercise of due diligence.

19 d) The government does not object to the continuance.

20 e) Based on the above-stated findings, the ends of justice served by continuing the
21 case as requested outweigh the interest of the public and the defendant in a trial within the
22 original date prescribed by the Speedy Trial Act.

23 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
24 et seq., within which trial must commence, the time period of April 28, 2025 to July 18,
25 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
26 T4] because it results from a continuance granted by the Court at defendant's request on the basis
27 of the Court's finding that the ends of justice served by taking such action outweigh the best
28 interest of the public and the defendant in a speedy trial.

1 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
2 Speedy Trial Act dictate that additional time periods are excludable from the period within which
3 a trial must commence.

4 IT IS SO STIPULATED.

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6 Dated: April 23, 2025

/s/ LINDA PARISI

LINDA PARISI

Counsel for Defendant

RICKY LEE WARE

9
10 Dated: April 23, 2025

/s/ CANDICE L. FIELDS

CANDICE L. FIELDS

Counsel for Defendant

KIMBERLY ANN WALLACE

12 Dated: April 23, 2025

/s/ JOHN R. MANNING

JOHN R. MANNING

Counsel for Defendant

CARLOS LEE SANCHEZ, Jr

16 Dated: April 23, 2025

MICHELE BECKWITH

Acting United States Attorney

/s/ NICHOLAS M. FOGG

NICHOLAS M. FOGG

Assistant United States Attorney

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FINDINGS AND ORDER

The court, having received, read and considered the parties' stipulation and good cause appearing therefrom, ADOPTS the parties' stipulation. Accordingly, the Status Conference scheduled for June 23, 2025 before District Judge Dale A. Drozd is VACATED and RESET for July 18, 2025 at 9:30 a.m. in Courtroom 8 before the Honorable Dena M. Coggins. The time period of June 23, 2025 to July 18, 2025 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4], as the ends of justice served by granting the continuance outweigh the best interest of the public and the defendants in a speedy trial. The time period of April 28, 2025, and June 23, 2025 was previously excluded as provided by District Judge Dale A. Drozd on April 18, 2025 in the Order filed at

IT IS SO ORDERED.

Dated: **April 24, 2025**


Dena Coggins
United States District Judge